

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOAN T. KLOTH,

Plaintiff,

V.

SOUTHERN CHRISTIAN UNIVERSITY,
BOARD OF DIRECTORS, *et al.*,

Defendants.

Civil Action 06-CV-244 (SLR)

DEFENDANT'S MOTION TO DISMISS

Defendant Southern Christian University, and its Board of Directors, (collectively, “Southern Christian”) hereby move for an order dismissing Plaintiff Joan T. Kloth’s complaint against Southern Christian for lack of personal jurisdiction under Fed. R. Civ. P. 12(b)(2). The grounds and arguments in support of this motion are set forth in the attached Brief in Support of Defendant’s Motion to Dismiss.

STRADLEY RONON STEVENS & YOUNG, LLP

October 20, 2006

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Southern Christian University,
And its Board of Directors

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Defendant's Motion to Dismiss was caused to be served on October 20, 2006 upon the below noted party at the record addresses noted for such *pro se* party by first-class mail, postage pre-paid:

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Newark, DE 19702

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